

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors: Jalipa, Brent \(BOS\); Lew, Lisa \(BOS\)](#)
Subject: FW: Appeal of Certification of the FEIR for SFPUC Alameda Creek Recapture Project
Date: Thursday, August 31, 2017 12:39:08 PM
Attachments: [Signed Ltr to CBS FEIR SFPUC Ala Creek Recapture Project 8-17.pdf](#)

From: Contreras, Maria [mailto:maria@acpwa.org]
Sent: Thursday, August 31, 2017 10:33 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Cc: Ackerman, Hank <hank@acpwa.org>
Subject: Appeal of Certification of the FEIR for SFPUC Alameda Creek Recapture Project

Attention: Clerk of the Board:

Please see attached (hard copy to follow).

Sincerely,

Maria B. Contreras
RIGHT OF WAY SERVICES SECTION | Direct: 510.670.5590 | maria@acpwa.org
ALAMEDA COUNTY PUBLIC WORKS AGENCY
399 Elmhurst Street, Hayward, CA 94544

On behalf of:

Hank Ackerman
Flood Program Manager
Alameda County Flood Control and
Water Conservation District
399 Elmhurst Street
Hayward, CA 94544
hank@acpwa.org



Daniel Woldesenbet, Ph.D., P.E., General Manager

399 Elmhurst Street • Hayward, CA 94544 • (510) 670-5480 • www.aqpwa.org

August 31, 2017

Clerk of the Board of Supervisors
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, California 94102

SUBJECT: SEPTEMBER 5, 2017 HEARING ON APPEAL OF CERTIFICATION OF THE FEIR FOR THE SFPUC ALAMEDA CREEK RECAPTURE PROJECT

Dear Members of the San Francisco Board of Supervisors:

The purpose of this letter is to express our support for the appeal of the certification by the San Francisco Planning Department of the Final EIR for the SFPUC's Alameda Creek Recapture Project. We are in agreement with the concerns of the National Marine Fisheries Service (NMFS), the California Department of Fish and Wildlife, the Alameda County Water District (ACWD), the Zone 7 Water Agency and the Alameda Creek Alliance that the FEIR is based on a flawed analysis of the impacts of the project on threatened Central California Coast Steelhead.

The Alameda County Flood Control and Water Conservation District (District) is responsible for protecting the communities of Union City, Newark, and Fremont from flooding and owns and operates the Alameda Creek Flood Control Channel from Mission Boulevard to San Francisco Bay. The District has been working with the ACWD for over a decade on improving fish passage within the channel to allow Steelhead to migrate to upstream spawning grounds. The District and ACWD are building a fish ladder to allow the Steelhead to pass over a flood control structure commonly known as the BART weir and ACWD's Rubber Dam No. 1. That fish ladder and other fish passage improvements to be constructed by ACWD between the fish ladder and Mission Boulevard total over \$48 million. In addition, the District has plans to reconfigure the channel from San Francisco Bay to the fish ladder in order to remove fish passage barriers and create a more sustainable low-flow fish passage channel within the channel. The cost to the District for this 9 mile long project is estimated at approximately \$53 million.

With a planned investment of nearly \$70 million for channel improvements to provide for Steelhead migration to upstream spawning grounds, the District is very concerned that the Recapture Project EIR did not adequately address the project's impacts on groundwater elevations and surface flows in Alameda Creek. Any reductions in flows below the minimum approved by the NMFS will have negative impacts on Steelhead migration in lower Alameda Creek.

Clerk of the Board of Supervisors
August 31, 2017
Page 2

With all due respect, the District requests that your Board reverse the certification of the EIR for the Alameda Creek Recapture Project, and that you direct SFPUC and Planning Department staff to work with the NMFS, CDFW, ACWD, the District and the Zone 7 Water Agency to develop a modeling methodology that uses daily flow data in a fully transparent manner.

It is our hope that by working collaboratively with all the agencies suggested, a recapture project can be developed that will meet the needs or requirements of all the stakeholders while promoting the recovery of the threatened Steelhead.

Sincerely,



Hank Ackerman, P.E.
Flood Control Program Manager

HA:mbc

C: Robert Shaver, General Manager, ACWD
Steve Ritchie, San Francisco PUC
Gary Stern, NMFS
Eric Larson, CDFW
Daniel Woldesenbet, Director, ACPWA
Jill Duerig, General Manager, Zone 7

BOARD OF SUPERVISORS



RICHARD VALLE
Vice President
Supervisor, District 2

August 30, 2017

Clerk of the Board of Supervisors
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, California 94102

Dear San Francisco Board of Supervisors,

I am writing to you on behalf of the concerned citizens and organizations in my district about the recent approval by the San Francisco Planning Department of the Alameda Creek Recapture Project (ACRP) Environmental Impact Report (EIR). The Alameda County Flood Control and Water Conservation District (District) has been monitoring the status of the San Francisco Public Utilities Commissions ACRP during the environmental review phase and has identified potential concerns with the EIR's conclusions. The District provided substantial comments to the San Francisco Planning Department on the Draft EIR on January 30, 2017.

The District is responsible for protecting the communities of Union City, Newark, and Fremont from flooding and owns and operates the Alameda Creek Flood Control Channel from Mission Boulevard to San Francisco Bay. The District has invested a substantial amount of time and money on this channel in an effort to provide flood protection in a more environmentally sensitive manner. Through coordination with the Alameda Creek Fisheries Workgroup, the District has initiated numerous projects within the Alameda Creek Watershed to enhance fish migration to promote the recovery of threatened Central California Coast Steelhead.

Review of the environmental documentation for the project indicates that the currently proposed ACRP may undermine the District's efforts to enhance the migration opportunities for this federally protected species. Specifically, the District is concerned that the operation of the ACRP will negatively impact downstream flows and substantially interfere with the movement or migration of Central California Coast Steelhead by significantly limiting migration opportunities to enter and navigate through the Alameda Creek Flood Control Channel downstream of the proposed ACRP site.

As an elected official representing the citizens of Alameda County, my office is requesting that the San Francisco Board of Supervisors reverse the approval of the Final EIR and direct the San Francisco Planning Department and Public Utilities staff to work collaboratively with the agencies and special districts operating in the Alameda Creek Watershed to analyze and develop a recapture project that can meet the needs of all stakeholders while promoting the recovery of endangered steelhead.

Sincerely,

A handwritten signature in black ink that reads "Richard Valle". The signature is written in a cursive style.

Richard Valle
Supervisor, Second District

1221 OAK STREET • SUITE 536 • OAKLAND, CALIFORNIA 94612 • 510 272-6692 • FAX 510 271-5115
24301 SOUTHLAND DRIVE • SUITE 101 • HAYWARD, CALIFORNIA 94545 • 510 259-1097 • FAX 510 259-0860

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Jalipa, Brent \(BOS\)](#); [Lew, Lisa \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: File #: 170893 Hearing - Appeal of Final EIR certification for Alameda Creek Recapture Project
Date: Friday, August 18, 2017 3:46:25 PM
Attachments: [OutlookEmoji-1489090978126_PastedImage9a2492e2-95cd-4a5d-8308-c47a1fdb697b.png](#)
[CalTrout Alameda Creek support letter.docx](#)

From: Patrick Samuel [mailto:psamuel@caltrout.org]
Sent: Friday, August 18, 2017 2:30 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Cc: Evan Buckland <Evan.Buckland@acwd.com>
Subject: File #: 170893 Hearing - Appeal of Final EIR certification for Alameda Creek Recapture Project

To the Clerk of the San Francisco Board of Supervisors:

Please find attached a letter from California Trout supporting the Alameda County Water District's request that the Board of Supervisors reverse their decision to certify the Final Environmental Impact Report for the San Francisco Public Utilities Commission's proposed Alameda Creek Recapture Project, identified in Planning Case No. 2015-004827ENV, certified by the Planning Commission through Motion No. 19952 dated June 22, 2017.

Please include this letter on the hearing appeal webpage. A hard copy has been mailed to your address for distribution to the individual Board of Supervisors members for consideration at the hearing scheduled for 9/5/2017.

Thank you for your consideration and the opportunity to comment on this matter.

Sincerely,
Patrick Samuel

[Patrick Samuel, M.A.](#)
[Bay Area Program Manager](#)



office: 415-392-8887 x104
cell: 916-502-6874

Read about CalTrout's work in





August 18, 2017

City and County of San Francisco
Clerk of the Board of Supervisors
Lisa Gibson, Environmental Review Officer
#1 Dr. Carlton B. Goodlett Place Room #244
San Francisco, CA 94102

Re: Support for Alameda County Water District's July 24 Request for the Board of Supervisors to Remand Final EIR of the Alameda Creek Recapture Project to the Planning Commission, Require Collaborative Analysis of Impact on Streamflows

Dear Lisa Gibson and Members of the Board of Supervisors:

I am writing in support of Alameda County Water District's reasonable and prudent request that the Board of Supervisors reverse the certification of the EIR and approval of Case No. 2015-004827ENV, the "Alameda Creek Recapture Project" (Project), and remand the final EIR to the Planning Commission to require the collaborative development of a new modeling tool to fully analyze potential Project impacts to federally threatened Central California Coast Distinct Population segment of steelhead (*Oncorhynchus mykiss irideus*) and downstream water users.

We support ACWD's request to develop a more robust and appropriate streamflow modeling tool to study the surface water/groundwater interaction and full suite of potential downstream impacts of the proposed Project. Operation of the Project as proposed will have the potential to significantly alter the availability and timing of sufficient flows to allow upstream passage of spawning adult and downstream passage of juvenile steelhead during critical migration windows below established thresholds (25cfs for adults, 12cfs for juveniles), causing potential "take" of steelhead in violation of the Endangered Species Act. These impacts were not sufficiently described nor analyzed in the Final EIR and should have been examined more closely.

SFPUC has been working with partners in the Alameda Creek watershed through the Alameda Creek Fisheries Work Group to improve stream conditions and passage for steelhead since 1997. California Trout recognizes the importance of Alameda Creek and its essential independent population¹ of steelhead to the recovery of the Central California Coast Distinct Population Segment, and is interested in engaging further with the Fisheries Work Group toward this goal.

We respectfully voice our support for ACWD's request, and look forward to working with SFPUC and other Alameda Creek stakeholders to improve fish passage and water supply reliability.

Thank you for your consideration.

Sincerely,

/s/ Patrick Samuel
California Trout Bay Area Conservation Program Manager

¹ National Marine Fisheries Service, 2016. *Final Coastal Multispecies Recovery Plan*. 649-681pp. Santa Rosa, CA.

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Jalipa, Brent \(BOS\)](#); [Lew, Lisa \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Alameda Creek recapture project
Date: Thursday, August 17, 2017 10:48:40 AM

From: Sarah Kupferberg [mailto:skupferberg@gmail.com]
Sent: Thursday, August 17, 2017 10:36 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Alameda Creek recapture project

Dear members of the SF Board of Supervisors,

I am writing to you as a scientist who has studied the amphibians of Alameda Creek since the late 1990's. I am very concerned about the impacts of the Alameda Creek recapture project in the Sunol Valley that were not adequately addressed in the EIR which was hurriedly approved. I ask you to direct the SFPUC and the SF Planning Commission to work with all watershed stakeholders on additional analysis of the relationship between ground water and surface water in the Sunol Valley.

This information is critical to determine whether the project has impacts on stream flows in Alameda Creek downstream of the project. Research conducted in the Alameda Creek watershed (Adams et al. 2017) indicates that low flows accentuate the problems caused by the deadly chytrid fungus. This disease is responsible for amphibian declines both globally and locally and its prevalence in Alameda Creek is directly related to stream flow levels. The Foothill Yellow Legged, which was elevated to candidacy as a threatened species under California Endangered Species Act just last month, will be losing suitable habitat once the new release schedule of water from Calaveras Dam takes effect because the water will be too cold to be suitable for the frogs. The water will warm to suitable levels once it reaches the area where the recapture project is located. The environmental review for this project has piecemealed the analysis of impacts of the Calaveras Dam Replacement Project and has not accounted for the new protected status of the frogs in the Creek.

The Supervisors of San Francisco should only approve a recapture project that will adequately protect native amphibians and steelhead trout which have received the bulk of conservation planning attention in Alameda Creek.

Thank you considering my comments.

Regards,

Sarah Kupferberg, Ph.D.
818 Mendocino Ave
Berkeley, CA 94707

Adams, A.J., Kupferberg, S.J., Wilber, M.Q., Pessier, A.P., Greffrud, M., Bobzien, S., Vredenburg, V.T. and Briggs, C.J., 2017. Extreme drought, host density, sex, and bullfrogs influence fungal pathogen infection in a declining lotic amphibian. *Ecosphere*, 8(3).

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Jalipa, Brent \(BOS\)](#); [Lew, Lisa \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Minimum Flows for Alameda Creek Steelhead Trout
Date: Monday, August 14, 2017 1:56:11 PM

From: Larry Thompson [mailto:thompson14ster@gmail.com]
Sent: Monday, August 14, 2017 1:08 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Minimum Flows for Alameda Creek Steelhead Trout

Dear SF Board of Supervisors:

The problem is that the connection between groundwater in the Sunol Basin with surface flow in Alameda Creek is unclear, and there are concerns that pumping during dry years could reduce low flows and opportunities for fish passage through Alameda Creek. I am asking you to direct the SFPUC and the SF Planning Commission to work with all watershed stakeholders on further analysis of the relationship between ground water and surface water in the Sunol Valley, thereby to determine whether the project has impacts on stream flows in Alameda Creek downstream of the project which could impede steelhead migration. San Francisco should only approve a recapture project that will adequately protect steelhead trout.

Thank you,
Lawrence Thompson
1069 Felicia Ct
Livermore, CA 94550

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Lew, Lisa \(BOS\)](#); [Jalipa, Brent \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Endangered species
Date: Monday, August 14, 2017 8:19:55 AM

-----Original Message-----

From: Jim Prola [<mailto:jimprola@yahoo.com>]
Sent: Sunday, August 13, 2017 6:10 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Endangered species

Dear SF Supervisors,

Please direct the SFPUC and the SF Planning Commission to work with all watershed stakeholders on additional analysis of the relationship between groundwater and surface water in the Sunol Valley, to determine whether the project has impacts on stream flows in Alameda Creek downstream of the project which could impede steelhead migration. San Francisco should only approve a recapture project that will adequately protect steelhead trout. Steelhead trout are an endangered species. Thank you in advance for your environmental understanding.

Mr/Mrs Jim and Hon Diana Prola

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Lew, Lisa \(BOS\)](#); [Jalipa, Brent \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Minimum Flows for Alameda Creek Steelhead
Date: Thursday, August 10, 2017 2:40:33 PM

From: M S [mailto:ms98stellarfp@yahoo.com]
Sent: Thursday, August 10, 2017 2:23 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Minimum Flows for Alameda Creek Steelhead

To the Board,

Please direct the SFPUC and the SF Planning Commission to work with all watershed stakeholders on additional analysis of the relationship between ground water and surface water in the Sunol Valley, to determine whether the project has impacts on stream flows in Alameda Creek downstream of the project which could impede steelhead migration.

I believe San Francisco should only approve a recapture project that will adequately protect steelhead trout.

Thank you for your time.

Respectfully,

M. Starr

(a resident and constituent of the Alameda Creek Alliance)

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Lew, Lisa \(BOS\)](#); [Jalipa, Brent \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Steelhead Trout Migration in Alameda Creek
Date: Wednesday, August 09, 2017 5:02:51 PM

From: Mary [mailto:hannonma@comcast.net]
Sent: Wednesday, August 09, 2017 4:36 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Steelhead Trout Migration in Alameda Creek

Dear Board of Supervisors:

Please direct the SFPUC and the SF Planning Commission to work with all the watershed stakeholders on additional analysis of the relationship between groundwater and surface water in the Sunol Valley to determine if the streamflow project for Alameda Creek could impede steelhead migration downstream of the project. Please approve a recapture project that will adequately protect the steelhead trout migration.

Mary Ann Hannon
309 Pearl Dr.
Livermore, CA 94550

Member Alameda Creek Alliance

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Lew, Lisa \(BOS\)](#); [Jalipa, Brent \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Safeguard Minimum Flows for Alameda Creek Steelhead
Date: Wednesday, August 09, 2017 12:53:53 PM

From: leslie jackson [mailto:les@well.com]
Sent: Wednesday, August 09, 2017 12:24 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Safeguard Minimum Flows for Alameda Creek Steelhead

Dear San Francisco Board of Supervisors,

Please direct the SFPUC and the SF Planning Commission to work with all watershed stakeholders on additional analysis of the relationship between ground water and surface water in the Sunol Valley, to determine whether the project has impacts on stream flows in Alameda Creek downstream of the project which could impede steelhead migration.

San Francisco should only approve a recapture project that will adequately protect steelhead trout.

Sincerely,

*Leslie Jackson
Oakland, CA 94602*

Leslie Jackson | les@well.com
www.mudfest.net
www.rocketstoves.com

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Lew, Lisa \(BOS\)](#); [Jalipa, Brent \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Sunol basin
Date: Wednesday, August 09, 2017 10:10:16 AM

From: Bruce Carter [mailto:bcorthodoc@gmail.com]
Sent: Wednesday, August 09, 2017 9:32 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Sunol basin

Please reconsider the project to capture water from the Sunol basin...we do not know enough about how that might affect flow into Alameda Creek, which is a critical resource in So. Alameda county.

Thank you for putting this issue on the agenda.

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Lew, Lisa \(BOS\)](#); [Jalipa, Brent \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Steel head trout in Alameda Creek
Date: Wednesday, August 09, 2017 9:36:11 AM

-----Original Message-----

From: Joan P Weber [<mailto:joanandfred@yahoo.com>]
Sent: Tuesday, August 08, 2017 9:57 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Steel head trout in Alameda Creek

Hello,

I am writing to ask you and the SF PUC and the Planning Commission to please work with all stake holders to insure that steel head trout return and migration are protected in all of Alameda Creek. There is concern the the proposed project to intermittently release cold water from Calaveras Dam and replace it with ground water in the Sunol area could have an adverse impact on steel head trout further down in Alameda Creek.

Let's not have different agencies working at cross purposes.

Thank you.

Joan Weber

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Lew, Lisa \(BOS\)](#); [Jalipa, Brent \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Alameda Creek
Date: Wednesday, August 09, 2017 9:35:01 AM

From: VLC2461@aol.com [mailto:VLC2461@aol.com]
Sent: Tuesday, August 08, 2017 9:38 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Alameda Creek

Please make sure that any decisions you make with regard to Alameda Creek be beneficial to the Steelhead Trout population. Too many agencies and so many hours of cooperation have brought us to the level of protection the Steelhead Trout have as of today. Don't jeopardize the progress that has been made.

Sincerely,

Virginia Cummins
2461 Balmoral Street
Union City, CA 94587

From: [Kern, Chris \(CPC\)](#)
To: [Lew, Lisa \(BOS\)](#)
Cc: [Joyce Hsiao](#); [Torrey, Irina \(PUC\)](#); [Ramirez, Tim \(PUC\)](#); [Antonia Sivyver](#); [Warren, Elaine \(CAT\)](#)
Subject: RE: ACA comments on SFPUC Alameda Creek Recapture Project
Date: Tuesday, August 08, 2017 3:00:40 PM
Attachments: [BAWSCA ltr re ACRP EIR appeal.pdf](#)
[image001.png](#)

Hi Lisa,
Please add the attached letter to the record for this appeal.
Thanks

Chris Kern
Senior Environmental Planner

Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-575-9037 **Fax:** 415-558-6409
Email: chris.kern@sfgov.org
Web: www.sfplanning.org

From: Lew, Lisa (BOS)
Sent: Thursday, August 03, 2017 10:25 AM
To: Kern, Chris (CPC)
Cc: BOS Legislation, (BOS)
Subject: FW: ACA comments on SFPUC Alameda Creek Recapture Project

Hi Chris,

Confirming we will include the attached letter as an official record for the Alameda Creek Recapture Project appeal.

Lisa Lew
Board of Supervisors
San Francisco City Hall, Room 244
San Francisco, CA 94102
P 415-554-7718 | F 415-554-5163
lisa.lew@sfgov.org | www.sfbos.org



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***Disclosures:** Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

From: Kern, Chris (CPC)
Sent: Thursday, August 03, 2017 9:54 AM

To: Lew, Lisa (BOS) <lisa.lew@sfgov.org>

Subject: FW: ACA comments on SFPUC Alameda Creek Recapture Project

Hi Lisa,

Per the voicemail message I left for you this morning, please add the attached letter to the record for the Alameda Creek Recapture Project EIR appeal.

Thanks,

Chris Kern
Senior Environmental Planner

Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103

Direct: 415-575-9037 **Fax:** 415-558-6409

Email: chris.kern@sfgov.org

Web: www.sfplanning.org

From: Secretary, Commissions (CPC)

Sent: Wednesday, August 02, 2017 10:31 AM

To: Gerber, Patricia (CPC)

Cc: Kern, Chris (CPC)

Subject: FW: ACA comments on SFPUC Alameda Creek Recapture Project

Office of Commission Affairs

Planning Department|City & County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103

Direct: 415-558-6309|Fax: 415-558-6409

commissions.secretary@sfgov.org

www.sfplanning.org

From: Alameda Creek [<mailto:alamedacreekalliance@gmail.com>]

Sent: Wednesday, August 02, 2017 9:58 AM

To: Secretary, Commissions (CPC); richhillissf@yahoo.com; Richards, Dennis (CPC);

planning@rodnevfong.com; Johnson, Christine (CPC); Koppel, Joel (CPC); Melgar, Myrna (CPC); Moore, Kathrin (CPC)

Subject: ACA comments on SFPUC Alameda Creek Recapture Project

SF Planning Commissioners:

Attached please find comments of the Alameda Creek Alliance on the SFPUC's Alameda Creek Recapture Project.

--

Jeff Miller

Director

Alameda Creek Alliance

(510) 499-9185

www.alamedacreek.org

BAWSCA

Bay Area Water Supply & Conservation Agency

August 2, 2017

Ms. Lisa Gibson, Director of Environmental Planning and Environmental Review Officer
Ms. Angela Calvillo, Clerk of the Board of Supervisors
City and County of San Francisco
#1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, California 94102

**Re: ACWD's Appeal of the June 22, 2017, Planning Commission Decision, and the
June 23, 2017, SFPUC Decision Regarding the Alameda Creek Recapture Project**

Dear Ms. Gibson, Clerk of the Board, and Members of the Board of Supervisors:

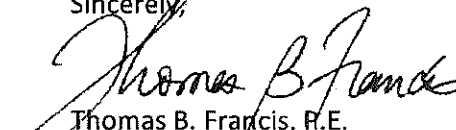
The Bay Area Water Supply and Conservation Agency (BAWSCA) has prepared this letter in regards to Alameda County Water District's (ACWD) appeal of the June 22, 2017 Planning Commission decision, and the June 23, 2017 Public Utility Commission (SFPUC) decision concerning the Alameda Creek Recapture Project (ACRP). BAWSCA represents the interests of 24 cities and water districts, an investor-owned utility, and a university, that purchase water wholesale from the San Francisco Regional Water System.

ACWD has copied BAWSCA on their letter in which they detail their requested appeal of the decisions as noted above. We are therefore aware of the concerns they have.

BAWSCA believes that the ACRP is an essential water supply project in the Water System Improvement Program. Its implementation is critical to meeting the water supply reliability needs of the 1.8 million residents served by our member agencies. We urge the parties (SFPUC and ACWD) to come together to resolve any outstanding issues that may be present, and to go about resolution of issues in a way that does not significantly impact ACRP's schedule or modify the overall scope.

If BAWSCA can play a role in helping to facilitate discussions between SFPUC and ACWD on the ACRP, please do not hesitate to contact us.

Sincerely,


Thomas B. Francis, P.E.
Water Resources Manager

cc: BAWSCA Board of Directors
Nicole Sandkulla, BAWSCA CEO / GM
Allison Schutte, Hanson Bridgett
Bob Shaver, ACWD, General Manager
Steve Ritchie, SFPUC, Assistant General Manager, Water Enterprise

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Jalipa, Brent \(BOS\)](#); [Lew, Lisa \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Alameda Creek Recapture Project
Date: Tuesday, August 08, 2017 2:50:53 PM

From: Scott Taylor [mailto:staylor@laclinica.org]
Sent: Tuesday, August 08, 2017 1:21 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Alameda Creek Recapture Project

To Whom It May Concern:

I am writing you regarding the Alameda Creek Recapture Project. There are some concerns regarding the project during drought years. There is concern that during drought years, the recapture project may endanger the passage of steelhead during those time. While I am not against the project per se, I would strongly recommend further study of the project and the issue of water flow during drought years. Hopefully, it will turn out that there will not be any detrimental effects to the fish during the drought years and all will be well with the project.

Thank you for your time and concern regarding this project.

Sincerely,
Scott Taylor
Alameda Creek Alliance Board Member

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Lew, Lisa \(BOS\)](#); [Jalipa, Brent \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Safeguard minimum flows for Alameda Creek
Date: Tuesday, August 08, 2017 11:10:35 AM

From: Judy Schriebman [mailto:judy@leapfrogproductions.com]
Sent: Tuesday, August 08, 2017 10:57 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Safeguard minimum flows for Alameda Creek

Dear SF Board of Supervisors:

As a creek advocate, I know how important it is to have adequate flows all year long to maintain a healthy riparian system, including the trees and wildlife but most importantly the fish in the stream.

I have also seen in every watershed basin—and it is recognized by hydrologists—that pumping water from the ground can lower the water table and reduce flows, both surface and subsurface, to the creeks in that watershed.

It is imperative that groundwater cannot be taken in excess of the needs of the whole watershed and creeks that rely upon it. It is therefore imperative to fully analyze ALL the water connections—creeks, wells, lakes, reservoirs, springs, etc—in order to accurately determine where the water is coming from, where it's going, and how much is ok to take for human uses while retaining good environmental functioning.

Please direct the SFPUC and the SF Planning Commission to work with ALL watershed stakeholders on additional analysis of the relationship between ground water and surface water in the Sunol Valley, to determine whether the project has impacts on stream flows in Alameda Creek downstream of the project which could impede steelhead migration. Tell the Supervisors that San Francisco should only approve a recapture project that will adequately protect steelhead trout.

The Alameda County Water District, which intends to build two fish ladders in lower Alameda Creek, filed an appeal of the project approval due to concerns about the unknown effects on stream flows intended to support steelhead migration. Federal and state fisheries agencies agree that project operations could diminish steelhead migration opportunities in some years, and recommended more study.

Water flows are tricky, but making false assumptions and building big projects based on them is unsound scientifically and environmentally.

Judy Schriebman
San Rafael, CA 94903

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Jalipa, Brent \(BOS\)](#); [Lew, Lisa \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Please Help Safeguard Minimum Flows for Alameda Creek Steelhead
Date: Tuesday, August 08, 2017 9:43:24 AM

From: kristinwomack [mailto:ktbakkimack@comcast.net]
Sent: Monday, August 07, 2017 6:31 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Please Help Safeguard Minimum Flows for Alameda Creek Steelhead

Dear SF Board of Supervisors:

I am writing to you to ask you to direct the SFPUC and the SF Planning Commission to work with all watershed stakeholders on additional analysis of the relationship between ground water and surface water in the Sunol Valley in order to determine whether the project has impacts on stream flows in Alameda Creek downstream of the project which could impede steelhead migration. Federal and state fisheries agencies agree that project operations could diminish steelhead migration opportunities in some years, and recommended more study.

San Francisco should only approve a recapture project that will adequately protect steelhead trout. Our threatened native species are clinging by a thread and they need extreme measures to prevent their extinction!

Sincerely, Kristin Womack

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Jalipa, Brent \(BOS\)](#); [Lew, Lisa \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Please do not do any Reduction in the needed water flow in the Alameda Creek for Steelhead.
Date: Tuesday, August 08, 2017 9:37:49 AM

From: panadbs@juno.com [mailto:panadbs@juno.com]
Sent: Tuesday, August 08, 2017 8:06 AM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Please do not do any Reduction in the needed water flow in the Alameda Creek for Steelhead.

Hello Board of Supervisors, Please do not do any Reduction in the needed water flow in the Alameda Creek for Steelhead. The filling of Sunol Gravel pits should not be done due to the Steelhead needing the water. Dave

[How To Fix Saggy Skin \(Doctors Shocked!\)](#)

Health Report

<http://thirdpartyoffers.juno.com/TGL3132/5989d38b26868538b2e7cst03vuc>



From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Jalipa, Brent \(BOS\)](#); [Lew, Lisa \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Please Safeguard Minimum Flows for Alameda Creek Steelhead
Date: Tuesday, August 08, 2017 9:36:06 AM

-----Original Message-----

From: Ron Goldman [<mailto:rgoldman@cs.stanford.edu>]
Sent: Monday, August 07, 2017 7:32 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Please Safeguard Minimum Flows for Alameda Creek Steelhead

Please direct the SFPUC and the SF Planning Commission to work with all watershed stakeholders on additional analysis of the relationship between ground water and surface water in the Sunol Valley, to determine whether the project has impacts on stream flows in Alameda Creek downstream of the project which could impede steelhead migration.

San Francisco should only approve a recapture project that will adequately protect steelhead trout.

thank you,

-- Ron --

From: [Board of Supervisors, \(BOS\)](#)
To: [BOS-Supervisors](#); [Jalipa, Brent \(BOS\)](#); [Lew, Lisa \(BOS\)](#); [Major, Erica \(BOS\)](#)
Subject: FW: Alameda Creek
Date: Tuesday, August 08, 2017 9:28:40 AM

From: Anne Veraldi [mailto:anneveraldi@hotmail.com]
Sent: Monday, August 07, 2017 6:40 PM
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>
Subject: Alameda Creek

Dear Supervisors and SF planning Commissioners:

Please protect Alameda Creek. Please work with the watershed stakeholders on additional analysis between the ground and surface water in Sunoi Valley to determine the projects impacts on streams flows in the Alameda Creek. Only approve a recapture project that will adequately protect steelhead trout.

Thank you.

Sincerely,
Anne Veraldi



Alameda Creek Alliance

P.O. Box 2626 • Niles, CA • 94536
Phone: (510) 499-9185
E-mail: alamedacreek@hotmail.com
Web: www.alamedacreek.org

August 2, 2017

San Francisco Board of Supervisors
1 Dr. Carlton, B. Goodlett Place, Room 244
San Francisco, CA 94102

Re: Planning Commission Decision Regarding Alameda Creek Recapture Project

Dear San Francisco Supervisors:

The Alameda Creek Alliance has concerns about the San Francisco Public Utilities Commission's (SFPUC) Alameda Creek Recapture Project and impacts that its operations could have on recovering threatened steelhead trout within the Alameda Creek watershed. We share the concerns about the inadequacies of the recently certified Environmental Impact Report (EIR) that have been raised by the National Marine Fisheries Service (NMFS), California Department of Fish and Wildlife (CDFW), and Alameda County Water District (ACWD). We support the ACWD petition to reverse the certification of the EIR for the project.

The Alameda Creek Alliance has more than 2,000 members and supporters. Since 1997 we have advocated for restoration of steelhead trout in the Alameda Creek watershed. We have worked with the SFPUC since 1999 to improve habitat conditions to support the recovery of steelhead. While we generally support the recapture project and the concept of off-stream rather than in-stream water recapture, state and federal fisheries agencies have determined that the final EIR does not contain sufficient information to support the conclusion that the project will not result in a less than significant impact on streamflows and fish migration in Alameda Creek.

The Alameda Creek Alliance submitted scoping comments on the Alameda Creek Recapture Project in 2015 and commented on the draft EIR for the project in January 2017. We have reviewed the SF Planning Commission's June 22, 2017 decision to certify the final EIR and the June 7, 2017 responses to comments on the EIR. We have also reviewed the ACWD's July 24, 2017 letter of appeal and concerns about the hydrology analysis used for the EIR; the July 24, 2017 comment letter from CDFW; and the July 27, 2017 comment letter from NMFS.

NMFS commented that the final EIR does not contain sufficient information to conclude that the project will not result in substantial effects on streamflows intended to support migration of steelhead trout, and in fact found that project operations will diminish migration opportunities for steelhead, especially outmigrating smolts, in some years. CDFW commented that the modeling analysis used for the EIR may be inadequate for the determination that the project will have "less than a significant impact" on fisheries resources of Alameda Creek.

An ACWD analysis of daily modeling data provided by the SFPUC after the close of the EIR comment period shows that project operations could result in increased numbers of days where streamflows in lower Alameda Creek fall below the threshold for fish passage, as determined by NMFS. ACWD commented that the hydrologic model relied on in the EIR's impact analyses is insufficient to analyze the surface water groundwater interaction necessary to fully evaluate project impacts. CDFW shared this concern that the modeling used in the EIR did not adequately address ground and surface water interaction in the stream reach of the proposed project, and that the EIR analyses do not adequately quantify the stream reach percolation

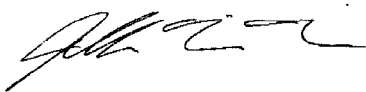
losses of SFPUC releases.

We are also concerned about the potential reduction in the number of days that steelhead could have access to spawning and rearing habitat upstream of the project. Data presented in the EIR shows that the current proposal for project operations will reduce the number of days where adequate streamflow is available for steelhead migration. The EIR uses monthly average changes in surface water flow to conclude that steelhead will not be harmed, whereas analysis of daily flows is needed to assess the effects of suitable streamflows for steelhead. We disagree with the EIR's conclusion that operation of the project will not significantly impact steelhead trout. There is simply not adequate information in the EIR to make a determination about streamflows and impacts to steelhead.

We request that the Board of Supervisors direct the SFPUC and the SF Planning Commission to work with all watershed stakeholders (including the ACA, ACWD, CDFW and NMFS) to undertake additional analysis of the relationship between ground water and surface water in the Sunol Valley, to determine whether the project has impacts on daily streamflows in Alameda Creek downstream of the project which could impede steelhead migration. If the SFPUC is unwilling to do this, the Board of Supervisors should uphold the ACWD appeal and reject the certification of the EIR for the project.

San Francisco has invested significant time and money in the Alameda Creek watershed to monitor and improve habitat conditions for steelhead trout. The future operations of the completed Calaveras Dam and Alameda Creek Diversion Dam will enhance steelhead spawning and rearing in stream reaches managed by the SFPUC. Both the SFPUC and ACWD are required to operate their facilities in Alameda Creek to meet specified flow requirements for steelhead. The Alameda Creek Recapture Project should support rather than undermine these efforts. We understand that this is the last Water System Improvement Project facility to be constructed, but it is important to get it right – the EIR must fully evaluate the potential impacts of the project, and San Francisco should only approve a recapture project that will meet the interests of all watershed stakeholders and adequately protect steelhead trout.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Miller', written in a cursive style.

Jeff Miller
Director
Alameda Creek Alliance
(510) 499-9184
jeff@alamedacreek.org

focus on changes in the amount of time flows exceed these minimum migration thresholds. In light of this comment, NMFS reviewed the daily modelling data provided to the Alameda County Water District on June 12, 2017, and found that ACRP operations will diminish migration opportunities for federally-threatened Central California Coast (CCC) steelhead (*Oncorhynchus mykiss*), especially outmigrating steelhead smolts, in some years. For instance, analysis of the daily streamflow data for May 2008 suggests ACRP operations could result in streamflows in lower Alameda Creek (as measured at the Niles Gage) dropping below the smolt passage threshold of 12 cfs for an additional 15 days when compared to the without ACRP condition.

Based on currently available information, NMFS does not concur with the Final EIR's conclusion that ACRP operations would not substantially interfere with the movement or migration of special-status fish species, including CCC steelhead (Impact B1-11 in the DEIR and Impact B1-16 in FEIR). We recommend San Francisco Planning Commission and the San Francisco Public Utilities Commission undertake additional analysis to examine the relationship between groundwater and surface water in the Sunol Valley for the purpose of determining the project's potential impacts on a daily time-step to streamflows in Alameda Creek downstream of the project site.

If you have any questions regarding these comments, please contact Rick Rogers at rick.rogers@noaa.gov, or 707-578-8552.

Sincerely,



Gary Stern
San Francisco Bay Branch Supervisor
North-Central Coast Office

cc: Tim Ramirez, SFPUC, San Francisco CA
Thomas Niesar, ACWD, Fremont, CA
Sean Cochran, CDFW, Santa Rosa, CA
Ryan Olah, USFWS, Sacramento, CA